



Home Invest
Belgium

Home Invest Belgium NV

Limited liability company (*Naamloze Vennootschap /
Société Anonyme*)

Listed regulated real estate company under Belgian law
Woluwedal 46

1200 Sint-Lambrechts-Woluwe - Brussel

Entity registration number 0420.767.885

VAT: BE 0420.767.885

Anti Bribery & Corruption policy

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General

Home Invest Belgium is committed to conducting its business in accordance with the guidelines set out in its Corporate Governance Charter and its Code of Conduct. The company upholds a zero-tolerance stance towards bribery and corruption, striving to promote transparency and ethical conduct in all operations. This policy serves to clarify the responsibilities of those it governs, and provide comprehensive guidance on preventing, identifying and addressing bribery and corruption risks. The fundamental objective is to mitigate any actions that might be interpreted as bribery or corruption, protecting both the organization's reputation and its reliability.

This policy is applicable to every entity owned or managed by Home Invest Belgium, and applies to all directors, senior management, and employees. It further extends its expectations of compliance to clients, suppliers, consultants, service providers, contractors, partners, and other stakeholders. Supplementing the Code of Conduct, this policy ensures compliance with anti-bribery and anti-corruption legislation in all relevant jurisdictions. This section addresses bribery and corruption risks specifically, whereas matters like conflicts of interest and insider trading are regulated by the Corporate Governance Charter and the Dealing Code, which clearly define these subjects and outline the procedures designed to mitigate them. In circumstances where stricter local laws or industry standards apply, those requirements will supersede this policy.

Procedures

The core principles of this policy are clear: Home Invest Belgium strictly forbids all forms of bribery and corruption. Every individual governed by the policy must avoid any direct or indirect participation in corrupt or bribery-related activity. Corruption is defined as the abuse of entrusted power for personal or third-party gain, encompassing any act intended to secure improper advantage for the company or its affiliates. Bribery consists of the offering, providing, receiving, or agreeing to receive any undue benefit—monetary or otherwise—intended to influence decisions. Not only the act itself, but even the intent to initiate a bribe, constitutes a violation of company standards. Furthermore, an unfair advantage refers to any benefit not legally owed to Home Invest Belgium or its associates. The policy recognizes active bribery, passive bribery and facilitation payments, and prohibits all undue advantages, regardless of value or form. Bribery is unacceptable whether directed towards public officials or private sector representatives.

When considering the giving or acceptance of anything of value, individuals must carefully assess whether it could be viewed as inappropriate. Any uncertainty should prompt consultation with the compliance officer.

Gifts, hospitality and entertainment are common in business and can reflect goodwill, but they must remain appropriate and never be used as a means to influence decision-making, secure undue advantage, or be construed as bribes. Cash payments and receiving cash is strictly forbidden. Any gift, hospitality, or entertainment (received or given) that exceeds a monetary value of €350, or does not conform to market customs, must be reported to the compliance officer.

When Home Invest Belgium participates in charitable and community initiatives, it always ensures such contributions do not mask bribery or provide unjustified business advantage. Supported charities must be non-political, play no role in procurement decisions, and receive contributions in a transparent manner. Payments must never be made to private accounts or individuals.

Engagements with public officials present a heightened risk of corruption, whether actual or perceived. No individual subject to the policy may offer anything of value to a government official to obtain business advantages or sway decisions. The use of company resources for political donations, or to support political campaigns, parties, or related entities, is strictly prohibited.

Home Invest Belgium does not independently participate in lawful lobbying efforts to advocate for favorable laws and policies but does provide feedback through industry groups such as BE-REIT.

Prevention and internal control

To prevent bribery and corruption, Home Invest Belgium maintains robust internal controls and risk management systems, in line with best practices for regulated real estate companies. Preventive measures include ongoing assessment of risk management procedures, the circulation of the Code of Conduct and related policies to all personnel, training on bribery and corruption risks, oversight by the Board of Directors and CEO, and routine reviews conducted by the compliance officer.

Compliance and sanctions

Breaches of this policy have the potential to damage the reputation and credibility of Home Invest Belgium. Non-compliance can result in disciplinary actions, including possible termination of employment or termination of all (commercial) relationships with Home Invest Belgium.

Reporting requirements

All individuals governed by this policy are strongly encouraged to report any concerns or suspected violations without fear of retaliation. Reports can be filed under the Whistleblower Policy or can be submitted directly to the compliance officer, ensuring issues are addressed promptly and appropriately.

Annex:

I. Definitions:

- **Active bribery:** i.e. giving, offering, promising, or authorizing any financial or other advantage, or anything of value, to any individual or organisation, with the intent to exert improper influence, induce the recipient to violate his or her duties, secure an improper advantage for the company, or improperly reward the recipient for past conduct.
- **Passive bribery:** i.e. requesting, soliciting, agreeing to receive, or accepting from any individual or organisation a bribe, kickback, influence payment, or any other improper or unlawful inducement, benefit or advantage.
- **Conflicts of Interest:** situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.
- **Entertainment:** travel, attendance at plays, concerts, and sport events.
- **Facilitation Payment:** a moderate payment made to a Public Official in order to expedite or secure the performance of a routine, non-discretionary government action such as issuing visas, permits or licenses or obtaining utility services. Payments to a Public Official (belonging to a government institution or agency) for legally required administrative fees do not constitute facilitation payments.
- **Gifts:** benefits of any kind given to someone as a sign of appreciation without expectation of receiving anything in return. They include 'courtesy gifts', which are small gifts given at culturally recognized occasions (e.g., weddings, funerals) or special times of the year (e.g., Christmas, New Year).
- **Hospitality:** refreshments, meals, and accommodation.
- **Influence:** providing an offer, payment, or promise with the intention to influence others to misuse their official position for Company or one of Company's business partner's benefits.
- **Insider trading:** buying or selling of a publicly traded company's securities (like stocks or bonds) based on material, non-public information about the company.
- **Lobbying:** interactions with policy makers and other external stakeholders with the intent to represent the company's perspective in the policy making process. Active contribution to policy making is an integral part of the democratic process and a legitimate activity as it enables the representation of different societal interests
- **Political Contributions:** monetary and non-monetary (commonly referred to as "in-kind" contributions, which include uses or resources, facilities, etc.) contributions to support political parties, movements, committees, political organisations and trade unions, or to their representatives and candidates.
- **Public Official:** officers, civil servants, and employees of the following entities, irrespective of rank:
 - Local, regional, national, or other governmental bodies (e.g., mayors, local tax authorities, police officers, fire personnel)
 - Judicial institutions (e.g., judges, clerks, notaries)
 - Legislative bodies (e.g., members of congress, city council members)

- Government-owned or government-controlled companies, defined as any company or organization wholly or significantly owned or controlled by any national, regional, or local government
- Public international organizations (e.g., the United Nations, World Trade Organization, International Monetary Fund)
- Relatives of public officials, political parties, party officials, elected government representatives, candidates for public office, and any private individual acting in an official capacity on behalf of any person or entity described above